

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-03032-Reid

FILED BY TS D.C.

May 20, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - Miami

UNITED STATES OF AMERICA

v.

ANDRES RAMON RODRIGUEZ,
LUIS BENEDIT, MICHAEL OLMEDO, and
FRANK RODRIGUEZ,

Defendants.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/Katherine W. Guthrie
Katherine W. Guthrie
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

Andres Ramon Rodriguez, Luis Benedit,
Michael Olmedo, and Frank Rodriguez,

Case No. 25-mj-03032-Reid

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/03/2025 - 05/19/2025 in the county of Miami-Dade, Florida in the
Southern District of Florida, the defendant(s) violated:

Code Section

21 U.S.C. § 841(a)(1) and 846, and
841(b)(1)(A)(i);

18 U.S.C. § 922(g)(1)

Offense Description

Conspiracy to distribute a mixture and substance containing cocaine
[Defendants: All];

Possession of a firearm by a convicted felon [Defendants: Andres Ramon
Rodriguez and Luis Benedit]

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



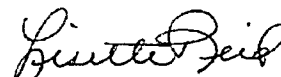
Complainant's signature

Victor Randou, Special Agent ATF

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time

Date: 05/20/25



Judge's signature

City and state: Miami, Florida

Honorable Lisette Reid, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Victor Randou, being first duly sworn, hereby depose and state as follows:

AGENT INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been so since July 2018. I have received training and participated in investigations related to firearms, narcotics, violent crimes, drug, and violent crime street organizations. I am currently assigned to the ATF High Intensity Drug Trafficking Area Task Force. I have personally been involved in numerous investigations concerning the possession, manufacturing, distribution, and importation of controlled substances, as well as methods used to finance drug transactions and launder drug proceeds.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I have attended multiple courses on conducting criminal investigations and have authored multiple electronic search warrants and complaints during my time with the ATF. During my law enforcement career, I have participated in multiple investigations involving violations of federal firearms and controlled substances laws, including possession and/or manufacturing of controlled substances, in violation of Title 21, United States Code, Section 841; possession of a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c); and possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g).

3. This Affidavit is submitted in support of a criminal complaint charging Andres Ramon RODRIGUEZ ("A.RODRIGUEZ"), Luis BENEDIT ("BENEDIT"), Michael OLMEDO a/k/a "Chama" ("OLMEDO"), and Frank RODRIGUEZ, a/k/a "Vecino," ("F.RODRIGUEZ") with: conspiracy to distribute 5 kilograms or more of a mixture and substance containing cocaine,

a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a), and 841(b)(1)(A)(i); and charging A.RODRIGUEZ and BENEDIT each with possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1).

4. This Affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts and information contained in this Affidavit are based on my personal knowledge and observation, as well as information received in my official capacity from other individuals, including other law enforcement officers involved in this investigation, as well as my review of records, documents, and other physical items obtained during the course of this investigation. This Affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

FACTUAL BACKGROUND

5. Through its investigation, law enforcement identified A.RODRIGUEZ and BENEDIT as leaders of a drug trafficking organization ("DTO") distributing cocaine in Florida. A.RODRIGUEZ and BENEDIT have each previously been convicted of a felony punishable by more than a year in prison. Based on this investigation, A.RODRIGUEZ and BENEDIT work with several narcotics distributors, including OLMEDO, and narcotics suppliers, including F.RODRIGUEZ. BENEDIT and A.RODRIGUEZ have discussed multiple times needing to compile money to pay "Frank" in order to obtain more narcotics.

6. On May 19, 2025, law enforcement executed federal search warrants at the residences of A.RODRIGUEZ ("A.RODRIGUEZ's Residence"), BENEDIT ("BENEDIT's Residence"), OLMEDO ("OLMEDO's Residence"), and F.RODRIGUEZ ("F.RODRIGUEZ's

Residence”).

7. At A.RODRIGUEZ’s Residence, law enforcement located a Ruger pistol in the kitchen and a pistol in a handbag in the front of the residence. Law enforcement confirmed with an ATF Nexus expert that the Ruger pistol was manufactured outside the state of Florida.

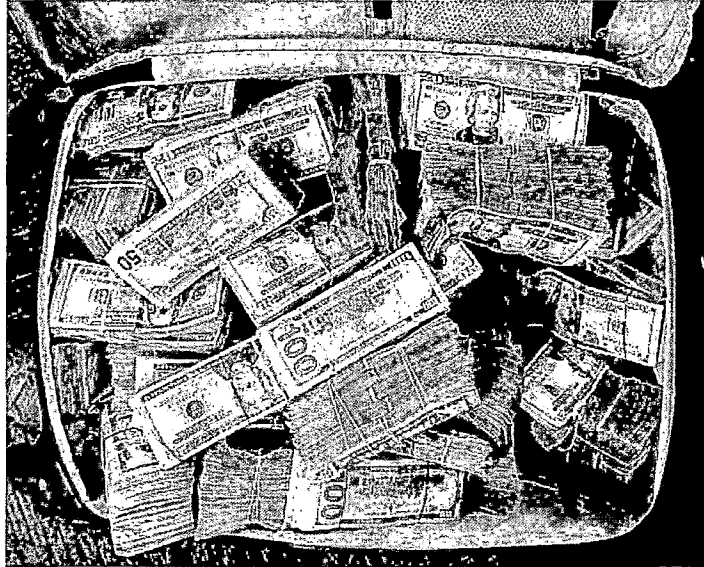
8. At BENEDIT’s Residence, law enforcement located approximately 5.5 kilograms of a white powdery substance, packaged in plastic bags, in a red cooler in the garage. A representative sample field-tested positive for the presence of cocaine. Law enforcement also located a Glock pistol in the main bedroom and approximately \$150,000 in cash. Law enforcement confirmed with an ATF Nexus expert that the Glock pistol was manufactured outside the state of Florida.

9. At OLMEDO’s Residence, law enforcement located approximately 3.5 kilograms of a white powdery substance contained in various plastic bags, consistent with narcotics packaging. A representative sample field-tested positive for the presence of cocaine. In several rooms, law enforcement recovered multiple wrappings consistent with the packaging of cocaine, as shown below:



10. At F.RODRIGUEZ’s Residence, which is located several minutes from A.RODRIGUEZ’s Residence, law enforcement recovered approximately three handguns, one

shotgun, and one AR-15 rifle. In the garage of F.RODRIGUEZ's Residence, law enforcement located a purple suitcase containing approximately \$720,000 in cash, as depicted below:



In a concealed compartment in the kitchen of F.RODRIGUEZ's Residence, law enforcement located: several plastic bags, consistent with narcotics packaging, containing a white powdery substance weighing approximately 540 grams; more than \$200,000 in cash; a Florida driver's license bearing a photograph of F.RODRIGUEZ with the name "Alejandro Garcia," residing in Palm Beach, FL; and two small plastic bags containing pink pills. A representative sample of the white powdery substance field-tested positive for the presence of cocaine. Prior to the execution of the search warrant, law enforcement observed BENEDIT picking up narcotics and dropping off money at the residence of F.RODRIGUEZ, located in Miami-Dade County, on multiple occasions.

11. On March 21, 2025, the Honorable Roy K. Altman, United States District Judge, Southern District of Florida, signed an order authorizing the interception of wire and electronic

communications occurring over two telephone lines used by A.RODRIGUEZ for a period of thirty days. *See* Case No. 25-WT-20004 (sealed).

12. In the evening of April 3, 2025, OLMEDO and A.RODRIGUEZ exchanged telephone calls, which were captured on active T-III wire intercept, and agreed to meet later that evening. Later, law enforcement observed, via pole camera, OLMEDO—driving a black Range Rover SUV (“OLMEDO’s Vehicle”)—arrive at and enter A.RODRIGUEZ’s Residence.

13. At approximately 7:42 pm, law enforcement observed, via pole camera, OLMEDO exit A.RODRIGUEZ’s Residence carrying a large box, followed by A.RODRIGUEZ carrying a small box. OLMEDO placed both boxes in the trunk of OLMEDO’s Vehicle. Law enforcement continued surveilling OLMEDO.

14. At approximately 8:09 pm, law enforcement observed OLMEDO arrive at a residence in Miami-Dade County, exit OLMEDO’s Vehicle, and then later, depart the residence in his vehicle. The trunk of OLMEDO’s Vehicle remained closed. Law enforcement continued surveilling OLMEDO.

15. At approximately 8:34 pm, law enforcement observed OLMEDO arrive at OLMEDO’s Residence and open the trunk of OLMEDO’s Vehicle. Law enforcement then saw OLMEDO remove a box consistent with one of the boxes placed in OLMEDO’s Vehicle at A.RODRIGUEZ’s Residence.

16. On April 19, 2025, at approximately 5:54 pm, the following communications were intercepted (the transcription has been translated from Spanish to English). In the transcription, “AR” refers to Andres RODRIGUEZ, “LB” refers to Luis BENEDIT and “FR” refers to Frank RODRIGUEZ.

**April 19, 2025, Recorded Conversation between A.RODRIGUEZ ("AR"),
BENEDIT ("LB") and F.RODRIGUEZ ("FR")**

[Translated transcription]

[Beginning of call]

[U/I] = Unintelligible

[Beginning of call]

AR: What happened?

LB: How's it going?

AR: Everything good, and you?

LB: [Aside: Here.] Pops, I'm right here with Vecino. Uh, how many was it that we got back?
One (1) or two (2)?

AR: Two (2).

LB: [Aside: Two (2), pops?] [Background: [U/I].] He says he thinks it's one (1). [Background:
It's two (2), I think.]

[Voices overlap]

AR: No.

LB: Hold on.

FR: Pops?

AR: Go ahead, son.

FR: Uh... was it one (1) or two (2) that I brought to you?

AR: Two (2) of them.

FR: Two (2)? Two (2), okay. Alright, thank you. [Aside: Okay.]

[Voices overlap]

AR: Alright.

[End of call]

17. Based on my training and experience and other intercepted calls, I believe that when A.RODRIGUEZ, BENEDIT, and F.RODRIGUEZ were discussing whether it was “one (1) or two (2),” they are discussing how many kilograms of cocaine F.RODRIGUEZ provided.

18. On April 28, 2025, the Honorable Rodolfo A. Ruiz II, United States District Court Judge, Southern District of Florida, signed an order authorizing the interception of wire communications on three telephone lines, being used by A.RODRIGUEZ, BENEDIT, and OLMEDO. *See* Case No. 25-WT-20004 (sealed).

19. On May 3, 2025, around 12:45 pm, law enforcement observed BENEDIT meet with OLMEDO in a shopping plaza in the Miami, FL area. During the meeting, OLMEDO provided a package to BENEDIT. Intercepted calls captured OLMEDO and BENEDIT discussing money that OLMEDO owed to BENEDIT. Based on these intercepted calls, law enforcement believes the package contained money owed to BENEDIT for narcotics BENEDIT provided OLMEDO.

20. Law enforcement then observed BENEDIT depart the shopping plaza. Law enforcement continued surveilling BENEDIT and followed BENEDIT directly to F.RODRIGUEZ’s Residence.

21. That same day, at approximately 12:57 pm, law enforcement observed BENEDIT drive to F.RODRIGUEZ’s Residence, immediately exit his vehicle, and greet F.RODRIGUEZ. Subsequently, F.RODRIGUEZ and BENEDIT walked to the rear passenger door of BENEDIT’s vehicle. BENEDIT removed a large bag and handed it to F.RODRIGUEZ. F.RODRIGUEZ took the bag and walked towards the front door of F.RODRIGUEZ’s Residence with the bag in hand. Due to the layout of F.RODRIGUEZ’s Residence, law enforcement could not view

F.RODRIGUEZ as he walked through the front door. BENEDIT then departed. Not long after, F.RODRIGUEZ left F.RODRIGUEZ's Residence.

22. On May 14, 2025, at approximately 1:19 pm, the following communications were intercepted between OLMEDO, identified as "MO," and BENEDIT, identified as "LB," (the transcription has been translated from Spanish to English):

May 14, 2025, Recorded Conversation between OLMEDO ("MO") and BENEDIT ("LB")
<p>[Beginning of call]</p> <p>[U/I] = Unintelligible</p> <p>Transcription begins at 00:01:08</p> <p>LB: ... As soon as he calls me. But I figure, that if I go with a little bit of money, it looks even better right now.</p> <p>MO: Huh.</p> <p>LB: And I was down the street from where we were at. But wait and see the traffic to come back here. It's gonna take me an hour to get back here! Huh! Why didn't you see this?</p> <p>[Voices Overlap]</p> <p>MO: Damn, [Stammers] and I gotta pick up my daughter [Unintelligible]. This is a mission. [U/I] like this one.</p> <p>LB: What do you want to do, then?</p> <p>MO: I'm right here! I'm in Aldi, waiting for you.</p> <p>LB: Okay. Let me drive all over there.</p> <p>[Voices Overlap]</p> <p>MO: [Stammers] I've been here for an hour.</p> <p>Transcription ends at 00:01:32</p>

23. Based on my training and experience and the investigation thus far, I believe that when BENEDIT said, "if I go with a little bit of money, it looks even better," BENEDIT was trying to obtain money from OLMEDO before meeting with his narcotics supplier.

24. At approximately 1:22 pm, law enforcement observed BENEDIT meet OLMEDO at a shopping plaza in Miami-Dade County. OLMEDO entered BENEDIT's vehicle with a white bag. Shortly after, OLMEDO exited BENEDIT's vehicle with nothing in hand. OLMEDO entered his vehicle, and both departed the location. Surveillance units followed both OLMEDO and BENEDIT.

25. Law enforcement followed BENEDIT to F.RODRIGUEZ's Residence and observed BENEDIT arrive at approximately 1:44 pm. Law enforcement had also observed F.RODRIGUEZ arrive at F.RODRIGUEZ's Residence shortly beforehand. F.RODRIGUEZ greeted BENEDIT outside of F.RODRIGUEZ's Residence and they both entered the building. Law enforcement could not see whether either F.RODRIGUEZ or BENEDIT was carrying anything. Subsequent intercepted calls captured BENEDIT informing A.RODRIGUEZ he had provided F.RODRIGUEZ with \$20,000 he had received from OLMEDO.

26. At approximately 2:07 pm, BENEDIT and F.RODRIGUEZ departed F.RODRIGUEZ's Residence in separate vehicles. Law enforcement followed BENEDIT to a nearby shopping plaza. BENEDIT met with OLMEDO and provided him a package. Based on intercepted calls and a subsequent traffic interdiction at which nine kilograms of cocaine were seized, law enforcement believes that F.RODRIGUEZ provided several kilograms of cocaine to BENEDIT at F.RODRIGUEZ's Residence, that BENEDIT then provided to OLMEDO.

CONCLUSION

27. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging A.RODRIGUEZ, BENEDIT, OLMEDO, and F.RODRIGUEZ with: conspiracy to distribute 5 kilograms or more of a mixture and substance containing cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a), and 841(b)(1)(A)(i); and charging A.RODRIGUEZ and BENEDIT each with possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1).

FURTHER AFFIANT SAYETH NAUGHT.



VICTOR RANDOU
SPECIAL AGENT
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1
by Face Time this 20th day of May 2025.



HONORABLE LISETTE M. REID
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA